



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION I

J.F. KENNEDY FEDERAL BUILDING, BOSTON, MASSACHUSETTS 02203-2211

August 17, 1993



Todd Bobar, RPM  
U.S. Department of the Navy  
Northern Division  
10 Industrial Highway  
Code 1823 - Mail Stop 82  
Lester, PA 19113-2090

RE: Outstanding Technical Issues associated with the Phase II  
RI/FS Workplan - Naval Education and Training Center (NETC),  
Newport, RI.

Dear Mr. Bobar:

Attached you will find a description of the issues in which the  
EPA and the State of Rhode Island believe require incorporation  
into the Phase RI/FS Workplan.

In order to resolve all of the outstanding issues associated with  
the Phase II RI/FS workplan, I have summarized and addressed the  
outstanding technical issues which were identified in the summary  
of the April 8, 1993 Technical Review Committee (TRC) meeting,  
dated July 7, 1993.

The attached comments have been numbered and sorted into both  
general and specific comments when possible. Your response to  
these concerns should reference these comment numbers. As I have  
previously expressed, both EPA and RI DEM believe that these  
issues and the necessary modifications are critical to the  
adequacy of the remedial investigation for this site and are  
reasonable in the level of effort required by the Navy.

I have attempted to be as specific as possible in the desired  
response to these attached comments. If the desired response is  
not readily apparent, then you should feel free to contact me at  
617/573-9614.

Sincerely,

Andrew F. Miniuks, Remedial Project Manager  
Federal Facilities Superfund Section

Attachment

cc: Paul Kulpa, RI DEM/DSR  
Greg Fine, RI DEM/DSR  
Mary Sanderson, EPA  
Mike Kulbersh, CDM-FPC



## **General Comments**

1. The Navy has proposed limiting the number of surface soil samples to be collected during Phase II of the Remedial Investigation. The Navy should consider applying the resources which will be realized from the reduction in surface soil sample to expanding the number of subsurface soil samples. The purpose of this effort would be to further determine the potential existence of areas of highly contaminated materials (i.e., "hot spots").

It is possible that some of the proposed locations for the collection of geotechnical data could also serve as locations to further determine the potential existence of areas of highly contaminated materials.

Therefore, submit the proposed locations for the collection of the geotechnical data and propose additional locations for collecting subsurface soil samples in suspected areas of highly contaminated materials.

### Site 01- McAllister Point Landfill

#### **Rationale for the McAllister Point Landfill Upgradient Monitoring Well Locations**

The Navy has proposed to assess the quality of the upgradient groundwater conditions by installing three (3) additional monitoring wells during the Phase II RI field work.

EPA and RI DEM have proposed to move one of the nested upgradient monitoring wells to a more downgradient location. As a result of this proposal, the Navy is seeking assurances that sufficient upgradient/background groundwater information would still be gathered by the reduced number of wells.

2. Reference Figure 5 of the RI/FS workplan - If the Navy moves the proposed location of MW-14(S/R) to the northern area of McAllister Point, then also move the proposed location of MW-15(S/R) slightly to the north. This revised location of MW-15(S/R) will help ensure that the background/upgradient groundwater conditions are monitored.

The Navy should note the discrepancies in the description of the monitoring wells listed on Figures 5 and 8 of the Phase II RI/FS workplan.

### Site 09 - Old Fire Fighting Training Area

3. During the installation of monitoring well MW-5, elevated levels of semi-volatile organic compounds (SVOCs) were noted in the soil borings. EPA and RI DEM believe that these elevated levels of SVOCs in the soils around MW-5 could be due to a previously unknown upgradient source of contamination.

To date, the Navy has agreed to conduct a limited soil gas survey in the area immediately adjacent to existing monitoring well MW-5.

At this time, both EPA and RI DEM are requiring the Navy to undertake additional efforts to further characterize upgradient soil and groundwater conditions. These additional efforts should consist of:

- a review and assessment of the current and historical utilities and storage areas;
- a soil gas survey around the location of the proposed monitoring wells MW-6(S/R); and
- the collection of groundwater samples from upgradient locations via a geoprobe in the immediate area of proposed monitoring wells MW-6(S/R).

### Site 12 - Tank Farm Four

4. The Phase I RI sampling results indicate the presence of potentially high levels of several inorganic compounds in the groundwater. The Navy has currently proposed several upgradient wells in the Phase II RI/FS workplan.

RI DEM and EPA have proposed to move the planned well MW-6 to a position southwest and downgradient of Tank #44 in the south-central portion of the site. In addition, EPA and RI DEM proposed to move planned monitoring well nest MW-8 approximately 200 feet towards the originally proposed location of MW-6.

The Navy is seeking assurances that the Phase I well nest MW-5 and the remaining proposed Phase II well nest MW-8 would provide sufficient background groundwater quality information for the groundwater data evaluation and the human health risk assessment.

The two remaining well locations will provide sufficient upgradient background groundwater quality information.

In addition, EPA and RI DEM are seeking modifications in the Phase II RI/FS workplan in order to determine the potential existence of sludge disposal pits within this study area. The Navy has verbally agreed to modify the Phase II workplan to include a limited subsurface investigation of the areas adjacent to the tanks. Neither EPA nor RI DEM have yet to receive this scope of work.

This modification of the workplan should include the testing of the oil/water separators at Tank Farms Four and Five.

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### Specific Comments

#### Appendix B - Field Sampling Methodology

##### Section 7.5 Groundwater Sampling Methods

5. As previously discussed with the Navy at the last Technical Review Committee meeting, EPA and the RI DEM both agree that the detection for the presence/absence of non-aqueous phase liquids (NAPLs) must be conducted at NETC. The presence or absence of NAPLs will directly affect the effort and timeframe required for remediating an area of concern. In general, as long as a NAPL is present in the soil and/or groundwater, the area will continue to pose an unacceptable risk to human health and the environment.

By addressing the potential presence of NAPLs within the characterization and assessment phase of this project, the Navy is helping to ensure that the results of the Phase II RI field work accurately reflect the extent of contamination within the environment. In addition, this additional effort should help ensure that the proposed remedies to address this contamination are as effective and efficient as possible.

During the July 15th TRC meeting, EPA and the State agreed to consider the Navy's proposal to limit the NAPL testing to a subset of monitoring wells at NETC. Both EPA and the State believe that the proposed wells will not adequately address the potential extent of NAPLs. Therefore, the Navy should modify the Phase II RI/FS workplan to include biannual testing for NAPLs via an oil/water separator (as previously defined in RI DEM's comments on the Phase II RI/FS workplan) for monitoring wells which meet the following criteria:

- all new on-site Phase II monitoring wells and;
- all on-site Phase I monitoring wells which have tested positive for organic contaminants.

All monitoring wells, which have either historically exhibited or currently exhibit the presence of NAPLs, should be routinely monitored for NAPLs. This routine monitoring should include; determining NAPL thickness and sampling and analysis of the NAPL layer.

#### Site 01 - McAllister Point Landfill

Volume III-1: Site 01 - McAllister Point Landfill Section 3.4 - Paragraph 2

6. In addition to the proposed soil gas survey within the vicinity of monitoring wells three (MW-3) and five (MW-5), the Navy should revise the workplan to include a focused soil gas survey within the soils surrounding borings three (B-3) and seven (B-7).

The limited soil gas survey should be consistent with the following:

- MW-5: expand limit of soil gas survey to B-10 to the south and B-9 to the north, use a fifty (50) foot alternating grid.
- MW-3: expand the limit of the soil gas survey to an effective area equal to B-6 in all directions, use a fifty (50) foot alternating grid.
- B-3: initial concentric circle, then an alternating fifty (50) foot grid.
- B-7: expand the limit of the soil gas survey to encompass B-6 to the north and extend the radius 100 feet to the south, an initial concentric circle then an alternating fifty foot grid.